

Stephen Davis,)	
)	Case No.: 7:24-CV-00633-HMH
)	
PLAINTIFF(S),)	
)	
v.)	
)	
Lee Mickens,)	
Dana Transport,)	
)	
DEFENDANT(S).)	
)	

(a) State the full name, address, and telephone number of all persons or entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

Workers Compensation Carrier based upon South Carolina Code of Laws 42-7-20.

(b) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER:

This matter should be tried by jury as it involves legal claims for negligence.

(c) State whether the Plaintiff submitted these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER:

No - - this is an Individual Plaintiff.

(d) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER:

This division is appropriate because the conduct occurred in this division.

(e) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases, which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases arise from the same or identical transactions, happenings or events; involve the identical parties or property, or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER:

No.

(h) Parties or Intervenor in a Diversity Case. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court's jurisdiction under § 1332(a).

ANSWER:

Stephen P. Davis, Plaintiff is a United States citizen and resident of Cherokee County, South Carolina.

Respectfully Submitted,

s/James W. Segura
James W. Segura (Federal Bar#: 6421)
304 Pettigru Street
Greenville, South Carolina 29601
P: (864) 271-2232
F: (864) 233-7516
jamessegura@varnerandsegura.com

Attorney for Plaintiff

Dated: February 21, 2024